

**STAMPUR & ROTH**  
ATTORNEYS AT LAW

WILLIAM J. STAMPUR  
JAMES ROTH

299 BROADWAY, SUITE 800 NEW  
YORK, N.Y. 10007

(212) 619-4240  
FAX (212) 619-6743

**USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED**

**DOC #:**

**DATE FILED:** 7/9/24 **APPLICATION GRANTED**

July 9, 2024

**SO ORDERED:**

*[Signature]*  
**Vincent L. Briccetti, U.S.D.J.**

**Dated:** 7/9/24  
White Plains, NY

**BY ECF**

The Honorable Vincent L.  
Briccetti  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

*David Mou, Esq., is appointed as  
associate counsel for defendant  
Jessica Francis pursuant to the  
SDNY CJA Mentoring Program.*

Re: *United States v. Jessica Francis, SI 23 Cr.468 (VB)*

Dear Judge Briccetti:

I represent Jessica Francis in the above referenced matter. I write to request the Court's authorization to have an associate counsel assigned. This letter requests permission to expend CJA funds related to the defense, it is submitted pursuant to 18 U.S.C. §§ 3006(A) and 3599(f) and is necessary for my effective representation of Mr. Francis.

Ms. Francis is charged in a multiyear marijuana conspiracy in violation of 21 U.S.C. §§ 841(a)(1), and 841(b)(1)(A). The discovery is extensive. It includes search warrant returns, jail calls, surveillance, lab reports and controlled buys,

The associate will assist in reviewing the pleadings and discovery to date, identifying and researching legal issues and consulting with Ms. Francis. He will consult with me on all matters concerning the case. The proposed associate is David Mou Esq. who is a mentee in the Eastern District's Mentoring Program. His resume is attached. Mr. Mou is an attorney admitted to practice in New York State and, as of recently, in the Southern and Eastern Districts of New York. Mr. Mou has been appointed as associate counsel to several cases in the Eastern District of New York and Southern District of New York.

The Board of Judges of the Eastern and Southern Districts of New York has implemented a Mentoring Program, which assigns experienced members of the District's CJA Panel to act as mentors for attorneys interested in applying to the Panel. The program is intended to improve the diversity and overall quality of the CJA Panel and is open to all interested and qualified attorneys.

The Program is designed to provide those attorneys with federal experience by pairing them with mentors and assigning them to cases that the District Court believes are of sufficient complexity to warrant the services of multiple attorneys. The mentee works under the close supervision of the mentoring attorney and is subject to the approval of the client and the District Judge to whom the case is assigned. The Mentee provides the first 15 hours on a *pro bono* basis and thereafter may bill at a rate of one-hundred and three dollars (\$103.00) an hour.

If this request meets with the Court's approval, I would appreciate it if Your Honor would endorse this letter so that I may create a voucher and have Mr. Mou begin working on the case.

Respectfully,

s/

James Roth

Enc. (1)

**DAVID MOU**30-10 41<sup>st</sup> Avenue, Suite 247 Queens, NY 11101 ▪ 347-830-8696 ▪**EXPERIENCE****Mou Legal PLLC, Founder**

June 2023 – Present

- Litigate violations of employee rights under the Constitution and applicable statutes
- Negotiate separation agreements on behalf of transitioning employees
- Defend individuals accused of violations of federal criminal law
- Support small and medium sized businesses with regulatory compliance and growth strategies
- Advocate for clients in administrative hearings, arbitrations, and litigation

**Fordham University School of Law, Adjunct Professor**

January 2016 – Present

- Instruct and mentor law students in trial advocacy skills

**Cover Whale Insurance Solutions, Inc., Head of Legal and Compliance**

June 2022 – June 2023

- Negotiated two new telematics strategic contracts that reduced hardware spend by 59%
- Coordinated application, objection response, and approval of admitted insurance products in fourteen states
- Led transition of entity and broker of record licenses with Departments of Insurance in forty-eight states
- Supervised outside counsel filing of two trademark applications and potential arbitration defense

**Cover Whale Insurance Solutions, Inc., Head of Regulatory Product Management**

January 2022 – June 2022

- Trained and mentored team to implement admitted state filings and monthly internal audits
- Coordinated negotiation of strategic insurance program contracts with outside carriers
- Strategized and advised the executive team on an innovative marketing campaign to reward safe driving
- Managed legal and regulatory compliance for all teams including drafting companywide policies

**Aircraft Lighting International, Inc., Counsel**

January 2017 – January 2022

- Led FAA approval for 32 new products and ongoing regulatory compliance for FAA ACO and MIDO Offices
- Landed first fleet, OEM, military, and commercial aircraft projects resulting in 60% revenue increase
- Managed company wide employee onboarding and separation including non-compete, NDA, and contracts
- Coordinated certifications for quality control (AS9100D), cybersecurity (NIST 800-171), and export (ITAR)
- Sponsored H1-B Visa and Green Card process for new employee

**Kasowitz, Benson, & Torres LLP, Associate**

June 2016 – December 2016

- Drafted successful motion to dismiss various breach of contract claims before the Commercial Division
- Conducted witness interviews and managed electronic discovery in multi-plaintiff litigation
- Drafted defense pleadings, motions, discovery requests, and disclosures for two employment litigation matters
- Coordinated two AAA arbitration matters from pleadings through arbitrator selection
- Researched novel issues related to non-competes, restrictive covenants, and criminal restitution

**NYC Law Department, L&E Division, Assistant Corporation Counsel**

August 2013 – June 2016

- Litigated two federal civil jury trials to defense verdicts in Southern and Eastern Districts of New York
- Litigated forty cases to dismissal or discontinuance through motion papers and oral arguments
- Took and defended ten depositions of plaintiffs or named defendants
- Prevailed at New York State Division of Human Rights administrative trial

**U.S. District Court, S.D.N.Y., The Honorable Robert P. Patterson Jr., Judicial Intern**

Spring 2013

**Queens County District Attorney's Office, Legal Intern**

Spring 2013

**U.S. Attorney's Office, S.D.N.Y., Legal Intern**

Summer 2012

**New York City Criminal Court, The Honorable Charles M. Troia, Judicial Intern**

Fall 2011

**Neighborhood Defenders Service of Harlem, Legal Assistant**

Summer 2011

**EDUCATION****Fordham University School of Law: Juris Doctor**

May 2013

*Fordham Journal of Corporate & Financial Law* - Associate Editor; ABA L&E Trial Advocacy Regional

Champion and National Semi-finalist; Archibald R. Murray Public Service Award; Renzulli Criminal Law Award

**Tufts University: Bachelor of Arts in International Relations**

February 2010

Dean's List three semesters, Studied Abroad Eberhard Karls Universität Tübingen, Germany

**PROFESSIONAL ACTIVITIES**

Judicial Screening Panels: NY Court of Appeals, NY County Civil and Supreme Court; AABANY: Secretary,

Judiciary Committee - Co-Chair; NYCLA Special Master (Hon. Nicholas Moyne); EDNY CJA Mentorship

Program (Mentee)

**ADMISSIONS: U.S. Supreme Court, Southern District of New York, Eastern District of New York, NYS 1<sup>st</sup> Dep't**